

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JOSEPH MARTIN AND BENJAMIN  
BRISLAWN,

*On behalf of themselves and those  
similarly situated,*

Plaintiffs,

v.

MSK Management, LLC; Mohammed S.  
Khan a/k/a Mike Khan; Boonton Pizza  
Corporation; Elizabeth Pizza Corporation;  
Leonia Pizza Inc.; Jersey Pizza, Inc.; Khan  
Enterprises, Inc.; Mount Penn Pizza, Inc.;  
Penn Street Pizza, Inc.; 125 N. Lewis Road  
LLC; 461 Springfield Ave. LLC; 335 Valley  
Road, Limited Liability Company; 1046  
Clinton Ave, LLC; 441-443 MLK Blvd,  
LLC; 115-125 Saint George Ave LLC; 479  
Pompton Ave. LLC; SI Pizza, Inc.; John Doe  
Corp. 1-10; John Doe 1-10.

Defendants.

Civil Action No 2:18-cv-11874-SDW-LDW

**CONSENT ORDER EXTENDING  
DEFENDANTS' TIME TO ANSWER  
OR OTHERWISE MOVE IN  
RESPONSE TO PLAINTIFF'S  
AMENDED COMPLAINT TO  
EXPLORE SETTLEMENT**


**WHEREAS** Plaintiffs Joseph Martin and Benjamin Brislawn ("Plaintiffs") and Defendants, through their undersigned counsel, hereby stipulate and agree as follows:

1. On July 20, 2018, Plaintiffs filed their Complaint in the above-captioned matter in the United States District Court for the District of New Jersey.
2. Defendants were served with the Summons and Complaint via Waiver of Summons on July 27, 2018, making their Answer due on September 25, 2018.
3. Defendants applied for a Clerk's Order Extending the Time to Answer Plaintiffs' Complaint by 14 days and was granted the same, making their Answer due on October 9, 2018.

4. Counsel believes that an opportunity exists to reach an agreement on conditional certification of the putative collective. Counsel are also discussing whether the parties would benefit from an early mediation before the parties engage in protracted and costly litigation.

6. Accordingly, Plaintiff's counsel consents to an extension of time of thirty (30) days for Defendants to answer or otherwise move with respect to the Complaint in order to give the parties the necessary time to consider possible agreement on conditional certification and potentially pursuing a resolution through early mediation.

**NOW THEREFORE**, it is hereby stipulated and agreed that the time by which Defendants must answer or otherwise move with respect to the Complaint be extended to November 8, 2018.

  
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Dated: 10/5/18

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Dated: \_\_\_\_\_

**SO ORDERED:**

\_\_\_\_\_, U.S.M.J.